

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

NVIDIA CORPORATION, *et al.*,

Defendants.

Civil Action No. 2:15-cv-998-JRG-JRP

CONSOLIDATED LEAD CASE

JURY TRIAL DEMANDED

JOINT MOTION TO STAY DEADLINES

Plaintiff Display Technologies, LLC (“Plaintiff”), and Defendant Sony Computer Entertainment America LLC (“Defendant”) have reached an agreement in principal that resolves all claims asserted between them in the above-entitled and numbered action. The parties expect to jointly file a dismissal with prejudice of all claims and a dismissal without prejudice of all counterclaims within 30 days. Accordingly, Plaintiff and Defendant respectfully request the Court stay all deadlines between them for 30 days, up to and including November 20, 2015. Plaintiff and Defendant request this stay, not for the purposes of any delay, but so that they may finalize and file dismissal papers without incurring additional expenses.

DATED October 21, 2015.

Respectfully submitted,

/s/ Stevenson Moore

Hao Ni

Texas Bar No. 24047205

hni@nilawfirm.com

Timothy T. Wang

Texas Bar No. 24067927

twang@nilawfirm.com

Neal G. Massand

Texas Bar No. 24039038

nmassand@nilawfirm.com

Stevenson Moore V

Texas Bar No. 24076573

smoore@nilawfirm.com

Ni, Wang & Massand, PLLC

8140 Walnut Hill Ln., Ste. 500

Dallas, TX 75251

Tel: (972) 331-4600

Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF,
ROTHSCHILD LOCATION
TECHNOLOGIES LLC**

/s/ Abran J. Kean

Abran J. Kean

Erise IP, P.A.

5600 Greenwood Plaza Blvd.

Suite 200

Greenwood Village, CO 80111

Telephone: 913-777-5600

Fax: 913-777-5601

Melissa Smith

Gillam & Smith, LLP

303 South Washington Avenue

Marshall, Texas 75670

Telephone: 903-934-8450

Fax: 903-934-9257

**ATTORNEYS FOR DEFENDANT
SONY COMPUTER ELECTRONICS
AMERICA, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of October, 2015, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Stevenson Moore

Stevenson Moore